

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DIVISION OF GEORGIA
ATLANTA DIVISION**

NANCY GIUSTO, individually and as
surviving spouse, and NANCY
GIUSTO, as Administratrix of The
Estate of Michael Giusto, deceased,

Plaintiffs,

v.

INTERNATIONAL PAPER
COMPANY, EVOQUA WATER
TECHNOLOGIES LLC, BILFINGER
INDUSTRIAL SERVICES INC., AND
BILFINGER WESTCON INC.,

Defendants.

CIVIL ACTION FILE

NO. 1:19-cv-646-LMM

NOTICE TO TAKE VIDEOTAPED DEPOSITION OF GLENN KEMP

PLEASE TAKE NOTICE, pursuant to Federal Rules of Civil Procedure 26 and 30, that beginning at 2:00 p.m. on Thursday, August 29, 2019 at the offices of Powers Law Group at 3557 Vineville Ave, Macon, GA 31204, and continuing from hour to hour and day to day until adjourned, counsel for Plaintiff shall proceed to take the deposition of **Glenn Kemp**. The deposition will be upon oral examination before an officer authorized by law to administer oaths and to take depositions. The deposition will be videotaped. The deposition will be taken for all purposes allowed by law.

This 17th day of July 2019.

Respectfully submitted,

LAW & MORAN

/s/ Brian C. Kaplan

Peter A. Law

Georgia Bar No. 439655

Brian C. Kaplan

Georgia Bar No. 644393

Attorney for Plaintiffs

LAW & MORAN

563 Spring Street, NW

Atlanta, Georgia 30308

CERTIFICATE OF COMPLIANCE

This is to certify that the foregoing *Notice to Take Videotaped Deposition of Glenn Kemp* has been prepared with one of the font and point selections approved by the Court in L.R. 5.1. Specifically, the above-mentioned pleading was prepared using Times New Roman font of 14 point size.

Respectfully submitted,

LAW & MORAN

/s/ Brian C. Kaplan
Brian C. Kaplan
Georgia Bar No. 644393
Attorney for Plaintiff

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CERTIFICATE OF SERVICE

This is to certify that on this day, I have served a true and correct copy of the foregoing *Notice to Take Videotaped Deposition of Glenn Kemp* with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to:

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This 17th day of July 2019.

Respectfully submitted,

LAW & MORAN

/s/ Brian C. Kaplan

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